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17 *TS-Optics Corporation*

18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 TS-OPTICS CORPORATION,

21 Plaintiff,

22 v.

23 MICROSOFT CORPORATION,

24 Defendant.

Case No. 8:24-cv-01974-DOC-DFM

**DECLARATION OF BENJAMIN  
T. WANG IN SUPPORT OF  
PLAINTIFF'S RESPONSIVE  
CLAIM CONSTRUCTION BRIEF**

To be heard by Special Master via  
Zoom

Hearing Date: October 9, 2025

Hearing Time: 10:00 a.m. Pacific

I, Benjamin T. Wang, declare and state as follows:

1. I am a member of the State Bar of California and an attorney at the firm of Russ, August & Kabat, counsel of record for Plaintiff TS-Optics Corporation in the above-captioned action. I submit this declaration in support of Plaintiff's Responsive Claim Construction Brief. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 18 is a true and correct copy of Section 2181 of the MPEP, downloaded from the U.S. Patent Office website.

3. Attached as Exhibit 19 is a true and correct copy of a printout of the Wikipedia page entitled "Low-pass filter," created on September 8, 2025.

4. Attached as Exhibit 20 is a true and correct copy of a printout of the Wikipedia page entitled "High-pass filter," created on September 8, 2025.

5. Attached as Exhibit 21 is a true and correct copy of a printout of the Wikipedia page entitled "Band-pass filter," created on September 8, 2025.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed this 25<sup>th</sup> day of September, 2025 at Los Angeles, California.

By: /s/ Benjamin T. Wang  
Benjamin T. Wang